



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 22, 2020

MEMO ENDORSED

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Felicien v. Bowes, et al.*, No. 19 Civ. 11934 (RA)

USDC-SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/22/20

Dear Judge Abrams:

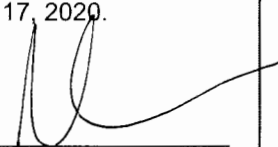
This Office represents the government in this action in which plaintiff seeks an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate her Petition to Remove Conditions on Residence (Form I-751). On behalf of the government, I write respectfully to request that the initial conference presently scheduled for January 31, 2020 be adjourned to a date at least one week after March 9, 2020, the day the government's response to the complaint is due.

The extension is respectfully requested because this Office is still investigating the facts and circumstances of this matter is still determining its litigation position with regard to its response to the complaint. In addition, USCIS has scheduled plaintiff for an interview in regards to her Form I-751 for February 4, 2020. Therefore, the government anticipates that the requested adjournment will provide adequate time for USCIS to interview plaintiff and then determine what next steps may be necessary in this case, or adjudicate plaintiff's Form I-751, which would render this action moot. This is the government's first request to adjourn the initial conference. Plaintiff's counsel consents to this request.

I thank the Court for its consideration of this letter.

Application granted. The initial conference scheduled for January 31, 2020 is hereby adjourned to March 24, 2020 at 11:00 a.m. The joint letter and proposed case management plan shall be filed no later than March 17, 2020.

SO ORDERED.


Hon. Ronnie Abrams
1/22/2020

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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